

**Edward Bronson**  
**3/23/2021**

<p>1 UNITED STATES DISTRICT COURT  2 SOUTHERN DISTRICT OF NEW YORK  3  4 SECURITIES AND EXCHANGE )  COMMISSION, )  5 )  6 Plaintiff, ) Case No.:  v. ) 12-CV-6421-KMK  7 )  8 EDWARD BRONSON, et al., )  9 )  10 Defendants. )  11 )  12  13 REMOTE DEPOSITION OF  14 EDWARD J. BRONSON  15 Tuesday, March 23, 2021  16  17  18  19  20  21  22  23  24 Reported by:  BRIDGET LOMBARDOZZI,  CSR, RMR, CRR, CLR  25 Job No. 210323BLO</p> <p>1</p>	<p>1 APPEARANCES (All appearing remotely):  2  3 For the Plaintiff:  4  5 UNITED STATES SECURITIES AND EXCHANGE COMMISSION  6 BY: MAUREEN PEYTON KING, ESQUIRE  7 CHRISTOPHER J. DUNNIGAN, ESQUIRE  8 New York Regional Office  9 200 Vesey Street  10 Suite 400  11 New York, New York 10281-1022  12 Telephone: 212.336.0111  13 Email: kingmp@sec.gov  14 dunnigancj@sec.gov  15  16 For the Defendants:  17  18 PAUL A. RACHMUTH, ESQUIRE  19 66 North Village Avenue  20 Rockville Centre, New York 11570  21 Telephone: 516.330.0170  22 E-Mail: paul@paresq.com  23  24  25</p> <p>3</p>
<p>1 UNITED STATES DISTRICT COURT  2 SOUTHERN DISTRICT OF NEW YORK  3  4 SECURITIES AND EXCHANGE )  COMMISSION, )  5 )  6 Plaintiff, ) Case No.:  v. ) 12-CV-6421-KMK  7 )  8 EDWARD BRONSON, et al., )  9 )  10 Defendants. )  11 )  12  13 Deposition of EDWARD J. BRONSON taken  14 remotely on behalf of Plaintiff, commencing at  15 10:02 a.m. and ending at 4:08 p.m., EST, on  16 Tuesday, March 23, 2021, before Bridget Lombardozzi,  17 CCR, RMR, CRR, CLR, and Notary Public of the  18 States of New York and New Jersey, pursuant to  19 notice.  20  21  22  23  24  25</p> <p>2</p>	<p>1 INDEX  2 WITNESS EXAMINATION  3 EDWARD J. BRONSON  4 BY MS. KING 8  5  6 EXHIBITS  7 SEC  8 NUMBER DESCRIPTION PAGE  9 Exhibit B White and Williams Invoice 118  10 No. 739900 9-12-19  11 WWBRONSON000036-48  12  13 Exhibit C White and Williams Invoice 135  14 No. 738287 8-16-19  15 WWBRONSON000022-29  16  17 Exhibit D Wells Fargo Checking Account 207  18 Statements - Top Knot, Inc.  19 NO BATES, 4 pages  20  21 Exhibit G V2IP Escrow Account 88  22 Ledger 11/16/16 - 4/19/16  23 SEC-RachmuthP-E-0004948-49  24  25</p> <p>4</p>

<p>1 I tried to be supportive to my wife to the best 2 extent of my ability. But I had no assets -- I 3 had no ownership role.</p> <p>4 <b>Q.</b> Did Baby China ever compensate you in 5 any way for your --</p> <p>6 <b>A.</b> No, Baby China -- no, it was a 7 pre-revenue company.</p> <p>8 <b>Q.</b> Did MadeOf LLC ever compensate you for 9 any of the services you just described?</p> <p>10 <b>A.</b> No. It was also a pre-revenue company 11 that had no funding.</p> <p>12 <b>Q.</b> What, if any, role did you have or do 13 you have in Bornganics, LLC?</p> <p>14 <b>A.</b> None. Just -- just so you understand, 15 all three entities revolved around the same 16 project that my wife was working on. I paid -- 17 my role for all three entities all was the same. 18 I had no ownership in any of those entities. I 19 just tried to help my wife.</p> <p>20 <b>Q.</b> Correct me if I'm wrong, 21 B-O-R-N-G-A-N-I-C-S?</p> <p>22 <b>A.</b> That's correct.</p> <p>23 <b>Q.</b> What, if any, role do you have or have 24 you had in Top Knot, Inc.?</p> <p>25 <b>A.</b> I -- Top Knot, Inc.? In Top Knot,</p> <p style="text-align: center;">45</p>	<p>1 educational background?</p> <p>2 <b>A.</b> He had a very limited educational 3 background.</p> <p>4 <b>Q.</b> Okay. What is his work history 5 generally?</p> <p>6 <b>A.</b> He has very limited work history 7 from -- that's -- let me rephrase that. My 8 father-in-law's work history is that originally 9 he was in the Navy. When he left the Navy, he 10 went to work in the diesel repair field. And 11 when my father-in-law met me, over a ten-year 12 period, we started exploring opportunities 13 together because I was trying to look for 14 opportunities to help my father-in-law and my 15 mother-in-law make money.</p> <p>16 <b>Q.</b> Okay. Who funded those opportunities?</p> <p>17 <b>A.</b> Generally most of those opportunities 18 were funded on speculation. So they were -- 19 they were opportunities which utilized my unique 20 ability to structure transactions on a credit 21 basis.</p> <p>22 <b>Q.</b> So who funded those opportunities?</p> <p>23 <b>A.</b> They were -- any opportunities that we 24 saw we would attempt to structure through 25 structured payments over a period of time.</p> <p style="text-align: center;">47</p>
<p>1 Inc. I was working with the company both as a 2 lawyer and also as an investment -- reviewing 3 investments and trying to structure 4 transactions.</p> <p>5 <b>Q.</b> What compensation did you receive for 6 those services?</p> <p>7 <b>A.</b> I received cash that -- or not cash, 8 but I received no direct compensation. My 9 father-in-law contributed to the household.</p> <p>10 <b>Q.</b> Okay. Apart from what you already 11 described, what was the nature of Top Knot, 12 Inc.'s business?</p> <p>13 <b>A.</b> Top Knot, Inc. was set up as a general 14 purpose vehicle to explore opportunities for my 15 father-in-law through my assistance wherever we 16 thought I would advise him on. So if I thought 17 there was a good opportunity in real estate, we 18 would start looking at real estate transactions 19 together. If I thought there was a good 20 opportunity in Hong Kong bonds, we would look at 21 Hong Kong bonds together.</p> <p>22 So it was a general purpose company 23 specifically to explore opportunities for my 24 father-in-law.</p> <p>25 <b>Q.</b> What is your father-in-law's</p> <p style="text-align: center;">46</p>	<p>1 <b>Q.</b> What was the source of the funds?</p> <p>2 <b>A.</b> There were no funds.</p> <p>3 <b>Q.</b> So you mentioned Hong Kong bonds, for 4 example. How -- what opportunities did you look 5 at with Hong Kong -- I'm trying to understand 6 how you --</p> <p>7 <b>A.</b> Well, it's very simple.</p> <p>8 <b>Q.</b> Let me just --</p> <p>9 <b>A.</b> Let me explain to you.</p> <p>10 <b>Q.</b> Let me finish my question. I'm trying 11 to understand how you, you know, found real 12 estate that you felt was a good opportunity or a 13 security that you felt was a good opportunity, 14 how you could make money without investing any 15 of your own or your --</p> <p>16 <b>A.</b> Well, let me ask you a question. All 17 right? When somebody who looks at a -- at a 18 real estate opportunity, what do they do? They 19 make an offer and then they look to structure 20 financing and structure a transaction such that 21 they can pay for the opportunity. Right? 22 That's what we did. We looked for funding. All 23 right? We looked for partners. All right? We 24 looked for partners to fund those transactions. 25 We looked for partners to fund those</p> <p style="text-align: center;">48</p>

1 right? We are not denying that I work for V2IP.  
2 We are not denying that I work for Top Knot. We  
3 are not denying that I assist both those  
4 entities.

5 **Q.** I'm sorry, you cut out. I can't hear  
6 you. Hello.

7 **A.** Yeah. I said we are not denying that  
8 I work for Top Knot or I've worked for Top Knot,  
9 Inc. or Top Knot, Inc. USA and assisted them.  
10 We're not denying that I work for V2IP or I've  
11 worked for them in the past and helped them.  
12 That's my only source of income, is when I get  
13 paid when I assist them. We live in a house  
14 together. All right? We work together. You  
15 want to address some of that income to me? Go  
16 ahead. We asked you, make us an offer. All  
17 right? We don't have a steady income. I don't  
18 have a business like we used to. All right?  
19 It's all about trying to develop something,  
20 which is what we're doing.

21 **Q.** Again, I can't hear you.

22 **A.** All right. Well, I'm sorry, that's --  
23 I'm here. I'm talking and participating.

24 **Q.** I understand that and I don't want to  
25 miss what you're saying. The last thing I --

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1 my father-in-law earns to me, we're happy to  
2 discuss that. All right? Nobody's hiding that.  
3 All right? Nobody's hiding anything at Top  
4 Knot, Inc. or Top Knot, Inc. USA or V2IP.

5 **Q.** Okay.

6 **A.** I am a transparent book. All right?  
7 I want to be done with this. I want to come to  
8 an agreement with you and be done and pay you.

9 **Q.** Okay. Can you tell me how much in the  
10 past year Top Knot, Inc. has earned?

11 **A.** Top Knot, Inc.? Nothing.

12 **Q.** All right. So I'm willing to -- and  
13 let's go down this road then.

14 **A.** Top Knot, Inc. -- Top Knot, Inc. --

15 **MR. RACHMUTH:** Ed, please stop.

16 Do you want to go off the record for a  
17 moment, Ms. King, just so we can talk  
18 about -- or is what you're talking about  
19 just a line of inquiry for your -- I'm  
20 confused as to where this is going.

21 **MS. KING:** Well, I want to -- is  
22 Mr. Bronson -- Mr. Bronson is sort of  
23 frozen on my screen.

24 **MR. RACHMUTH:** Yeah, he froze on  
25 mine -- no, he's moving --

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1 I'm not --

2 **MS. KING:** Bridget, are you able  
3 to --

4 **A.** Excuse me. Attorney King, I made it  
5 very clear. All right? There's no steady  
6 source of income. I assist, work as a lawyer  
7 for Top Knot, Inc. USA. For Top Knot, Inc. I  
8 did both legal and advisory services for  
9 investing and those are my -- that's what I do.  
10 All right? And for V2IP. All right? And we  
11 don't have a steady source of income. We don't  
12 have tons of money rolling in. All right?

13 In fact, you limited my ability with  
14 this judgment. All right? I am trying to build  
15 something with my father-in-law and with my  
16 wife.

17 **Q.** You're cutting out again.

18 **A.** I answered. I'm waiting for the next  
19 question.

20 **Q.** I couldn't hear your answer.

21 **A.** My answer was confirming what I've  
22 said three times. We have no steady income.  
23 I'm not paid a salary. All right? We work  
24 together. My wife, my father-in-law, myself.  
25 All right? If you want to address income that

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1 **Q.** Can you hear us, Mr. Bronson?

2 **A.** I can hear you fine.

3 **Q.** Okay. Super.

4 **MS. KING:** It's for -- if you need  
5 to take a break, that's fine, but I'd like  
6 to explore what Mr. Bronson is saying.

7 **THE WITNESS:** Go ahead.

8 **MR. RACHMUTH:** Ed, why don't you  
9 let Ms. King ask specific questions and  
10 please answer to the extent you can that  
11 does not violate your attorney-client  
12 privilege with Top Knot, answer the  
13 specific questions.

14 **THE WITNESS:** That's fine.

15 **MS. KING:** Okay.

16 **BY MS. KING:**

17 **Q.** I'd like -- can you give me a sense,  
18 Mr. Bronson, of how much you, your wife and your  
19 father-in-law have earned through Top Knot, Inc.  
20 in the -- for 2018, '19 and '20?

21 **A.** Top Knot, Inc.?

22 **Q.** Yeah. We'll focus on each entity  
23 separately first.

24 **A.** Top Knot, Inc., probably nothing.  
25 Zero.

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<p>1 Q. Okay. Can you give me a sense of how 2 much income you, your wife and your 3 father-in-law have earned from Top Knot USA in 4 2018, 2019 and 2020?</p> <p>5 A. 2018 and '19, nothing, because the 6 company wasn't formed until 2020.</p> <p>7 Q. All right.</p> <p>8 A. Top Knot, Inc. was formed in 2019. 9 2020? I don't know, a couple hundred thousand 10 maybe Top Knot, Inc. USA made. I don't know. 11 Listen, I'm sure Jon Kellas would be happy to 12 tell you the exact amount.</p> <p>13 Q. I'm sorry, I heard "I'm sure Jon 14 Kellas" --</p> <p>15 A. I'm sure Jon Kellas will be happy to 16 provide you with the exact amount the company's 17 earned. I don't know the exact amount.</p> <p>18 Q. Okay. How much have you, your wife -- 19 you and your wife taken out of Top Knot USA 20 since it was formed?</p> <p>21 A. You have our bank records. Any money 22 that's come out of Top Knot USA has gone into 23 V2IP or my wife's personal account. It's 24 marginal at best. Maybe \$100,000 this year, 25 \$150,000, that were put into the companies?</p> <p>57</p>	<p>1 A. Oh, what happened? Not -- what 2 happened is that the project had slowed to a 3 halt in Turks and Caicos and weren't pursuing -- 4 it was on delay and we weren't earning money. 5 We weren't making any money. We couldn't move 6 forward on it. It was delayed.</p> <p>7 Q. What's the current status of the 8 project?</p> <p>9 A. It's on hold.</p> <p>10 Q. Why?</p> <p>11 A. Because there was a new government 12 voted in in September, I believe, and our 13 proposal which was put in for the contract is at 14 the Attorney General's office pending review.</p> <p>15 Q. When in 2020 was the project put on 16 hold?</p> <p>17 A. The election occurred -- I don't know 18 the exact date. Somewhere in the September 19 range.</p> <p>20 Q. What I'm wondering, then, is why 21 this -- this change from 900,000 to 100,000. So 22 if things were consistent for 2018 and '19 and 23 it wasn't until later, 2020, that there was a 24 change that caused the --</p> <p>25 A. We were -- we were exclusively working</p> <p>59</p>
<p>1 Maybe some more money that was paid directly for 2 bills from this entity. We're not taking tons 3 of money. You have all our records.</p> <p>4 Q. And how much money have you and your 5 wife earned from V2IP?</p> <p>6 A. You have our bank records.</p> <p>7 Q. The --</p> <p>8 A. Since two thousand -- I -- I don't 9 know. The exact amount, I don't know. The 10 records state I think somewhere in the 900,000 11 range in '18 and '19 and '20 was less, probably 12 75 or 100,000. I don't know the exact number. 13 And '21, little or nothing.</p> <p>14 Q. Okay. Just so I am sure I understand, 15 in 2018 about 900,000?</p> <p>16 A. Yes.</p> <p>17 Q. And in 2019, another 900,000 you and 18 your wife --</p> <p>19 A. That's correct.</p> <p>20 Q. -- got from V2IP? Okay. That's 21 helpful.</p> <p>22 What changed between 2019 and 2020?</p> <p>23 A. Nothing.</p> <p>24 Q. How did V2IP go from earning \$900,000 25 a year to 100,000 --</p> <p>58</p>	<p>1 on Turks and Caicos and there was no revenue 2 streams from Turks and Caicos for V2IP.</p> <p>3 Q. Okay. In 2018 and --</p> <p>4 A. The life cycle of a company, sometimes 5 they make money, sometimes they don't make 6 money. All right? What V2IP was focusing on at 7 that point from the end of 2019 through 2020 was 8 the development in the Turks and Caicos project. 9 There was no income to be derived from that.</p> <p>10 Q. Okay.</p> <p>11 A. There was not a substantive income in 12 V2IP.</p> <p>13 Q. What was V2IP working on in 2018 and 14 2019 to generate about \$900,000 income per year 15 for you and your wife?</p> <p>16 A. We were working with people on an 17 opportunity. I represented the Krost family and 18 I was advising them legally on opportunities. I 19 can't expand past that because of privilege, but 20 I was working with them and they were paying me 21 a salary, a legal salary, legal fees in 22 connection with my advice, my legal advice.</p> <p>23 Q. Were you also involved in trading 24 securities for the Krostes?</p> <p>25 A. No.</p> <p>60</p>



<p>1 pursuing.</p> <p>2 Q. Okay.</p> <p>3 A. I can't disclose more than that, but</p> <p>4 the answer is yes.</p> <p>5 Q. Okay.</p> <p>6 A. The answer is yes.</p> <p>7 Q. Does Top Knot, Inc. have any bank</p> <p>8 accounts?</p> <p>9 A. Yes. Top Knot, Inc. USA, not Top</p> <p>10 Knot, Inc.</p> <p>11 Q. Okay. So Top Knot, Inc. does not have</p> <p>12 any bank accounts. Top Knot, Inc. USA has bank</p> <p>13 accounts?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Where are Top Knot, Inc. USA's</p> <p>16 bank accounts?</p> <p>17 A. Wells Fargo. We told you that. We've</p> <p>18 provided that, I believe.</p> <p>19 Q. I can still ask about it as part of</p> <p>20 this deposition.</p> <p>21 A. No, absolutely. I'm just clarifying</p> <p>22 that we provided that to you.</p> <p>23 Q. Can you approximate for me how many</p> <p>24 transactions you've worked on with Mrs. Bronson?</p> <p>25 A. My wife?</p> <p>81</p>	<p>1 together?</p> <p>2 A. Yes. Yeah.</p> <p>3 Q. Okay. Does V2IP have any bank</p> <p>4 accounts?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Does V2IP have a savings</p> <p>7 account?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Were what -- I don't understand</p> <p>10 us to have received all of the records for</p> <p>11 V2IP's savings account.</p> <p>12 A. I believe we gave you all the records.</p> <p>13 If we didn't, we're happy to provide them.</p> <p>14 Q. Okay.</p> <p>15 MR. RACHMUTH: I think we've given</p> <p>16 all of the banking records.</p> <p>17 A. If we haven't, we're happy to provide</p> <p>18 them. No problem.</p> <p>19 Q. Okay. Yeah, I'm going to request that</p> <p>20 you go back and provide any savings accounts</p> <p>21 records.</p> <p>22 A. I apologize for the discovery process</p> <p>23 because there was so many different e-mails and</p> <p>24 letters. I tried to be concurrent and diligent</p> <p>25 in my answer, but we might have missed</p> <p>83</p>
<p>1 Q. Yes.</p> <p>2 A. I don't know. I mean, you know -- I</p> <p>3 don't know.</p> <p>4 MR. RACHMUTH: If you don't know</p> <p>5 the answer, please don't guess.</p> <p>6 A. I can't guess. I don't know.</p> <p>7 Q. Okay. When you work on a transaction</p> <p>8 with your wife, are there specific parts of the</p> <p>9 transaction you handle versus she handles or how</p> <p>10 do you work together?</p> <p>11 A. Yes. So my wife -- just so you</p> <p>12 understand -- and this was a question that you</p> <p>13 had asked about Islay, correct. My wife and I</p> <p>14 will discuss -- my wife is very good at working</p> <p>15 Westlaw. So my wife will do diligence research</p> <p>16 for me if I ask her.</p> <p>17 So I'll say look up such and such a</p> <p>18 person in connection with this proposed</p> <p>19 transaction. We need to check that and make</p> <p>20 sure they have no criminal history, that there's</p> <p>21 no civil litigation. You know, we do a</p> <p>22 background check on everybody and that's what --</p> <p>23 she handles all that.</p> <p>24 Q. Okay. And is that essentially her</p> <p>25 role in whatever transactions you've undertaken</p> <p>82</p>	<p>1 something, so I apologize.</p> <p>2 Q. Okay. Does V2IP have any securities</p> <p>3 accounts?</p> <p>4 A. No.</p> <p>5 Q. Does --</p> <p>6 A. Oh, excuse me. Excuse me. All right?</p> <p>7 V2IP had an account at Scottsdale. I am not</p> <p>8 sure that it's actually still open. It hasn't</p> <p>9 been utilized since 2016. We were frozen from</p> <p>10 it in connection with the litigation and we've</p> <p>11 never accessed it since. And I believe in the</p> <p>12 bankruptcy that they -- that it was closed, but</p> <p>13 I'm not sure.</p> <p>14 Q. Okay.</p> <p>15 A. But we don't use it. So no. It's at</p> <p>16 Scottsdale.</p> <p>17 Q. Okay. But it is still --</p> <p>18 A. It was previously disclosed.</p> <p>19 Q. If it's still open, I'd like to</p> <p>20 request the statements from it.</p> <p>21 A. Absolutely.</p> <p>22 Q. Okay. Does V2IP have any connection</p> <p>23 to Alpine Securities?</p> <p>24 A. Well, just for the record, Alpine and</p> <p>25 Scottsdale, up until a year or two ago, when the</p> <p>84</p>

1 be able to. With respect to Top Knot, Inc. USA,  
2 it was done specifically with a target  
3 structure, a target investment thesis, and a  
4 U.S.A. specific thesis.  
5 **Q.** Did you direct Mr. Krost to send funds  
6 to V2IP instead of to Top Knot?  
7 **A.** I don't -- I don't remember.  
8 **Q.** Does Mr. Kellas ever have interactions  
9 with the Krosts?  
10 **A.** No, other than when the Krosts have  
11 been over and we -- he hasn't called them on the  
12 phone, but he knows them. They've been in our  
13 house many times.  
14 **Q.** Okay. But does Mr. Kellas have any  
15 business dealings with the Krosts?  
16 **A.** He doesn't talk to them, no.  
17 **Q.** Okay. Does Mrs. Bronson have any  
18 business dealings with the Krosts?  
19 **A.** No.  
20 **Q.** Okay. So is there anyone but you that  
21 could have directed the funds to V2IP instead of  
22 Top Knot?  
23 **A.** No.  
24 **Q.** Okay. Does Deer Valley have any role  
25 in the Turks and Caicos project?

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1 **A.** No. Deer Valley is not an operational  
2 entity.  
3 **Q.** Okay.  
4 MS. KING: Chris, can you publish  
5 Exhibit B?  
6 MR. DUNNIGAN: It's uploaded.  
7 (Whereupon, exhibit is presented  
8 and marked Bronson SEC Deposition Exhibit  
9 B for identification.)  
10 MS. KING: Okay.  
11 **A.** One second.  
12 BY MS. KING:  
13 **Q.** Sure. Take your time. And take your  
14 time looking at the document as well.  
15 **A.** The famous White and Williams billing  
16 statement. All right. I got it.  
17 **Q.** Okay. All right. Do you recognize  
18 this document?  
19 **A.** I recognize it as a bill from White  
20 and Williams. I already recognize that there's  
21 inaccuracies right on the first page, but that's  
22 irrelevant.  
23 **Q.** Well, what inaccuracy do you recognize  
24 on the first page?  
25 **A.** Well, first off, we haven't been --

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1 Deer Valley hasn't been used since 2000 -- I'd  
2 say conservatively '15, but more probably '14.  
3 **Q.** Okay.  
4 **A.** Two, I don't have an office at 245  
5 Main Street since 2016.  
6 **Q.** Okay.  
7 **A.** Three, Richard Stillitino hasn't  
8 worked for me since 2016. He left, started his  
9 own firm.  
10 Three, Deer Valley was never once ever  
11 mentioned in Turks and Caicos and had never been  
12 spoken, uttered or utilized at White and  
13 Williams. This, again, speaks to my comments or  
14 my response in my disclosure. All right?  
15 An individual, I didn't specifically  
16 name Allen Tucci, but an individual who was our  
17 attorney for both Deer Valley and other  
18 entities, created fraudulent documentation and  
19 billing. Turks and Caicos had nothing to do  
20 with Richard Stillitino, has nothing to do with  
21 Deer Valley and this is an inaccurate and false  
22 report with respect to Deer Valley.  
23 Now, the time sheet with respect to  
24 Turks and Caicos might be accurate, but was  
25 never anything to do with Deer Valley. And,

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1 listen, I've testified to that or at least I've  
2 been deposed, unofficially deposed twice now by  
3 Mr. Conway with respect to all those things on  
4 those Deer Valley billing statements.  
5 **Q.** Okay. I am going to focus on the  
6 Turks and Caicos details on the statement.  
7 **A.** Good.  
8 **Q.** And just as an initial matter, have  
9 you -- in the ordinary course of your business,  
10 have you seen this bill before?  
11 **A.** No.  
12 **Q.** Did you either directly or through any  
13 entities pay White and Williams legal fees in  
14 connection with Turks and Caicos?  
15 **A.** No.  
16 **Q.** Okay.  
17 **A.** I paid no legal fees to White and  
18 Williams. In fact, there's substantive  
19 correspondence between myself, Mr. Finney, the  
20 managing member of the firm, specifically  
21 saying, one, you haven't provided me documents  
22 for Deer Valley or any of our entities with  
23 respect to billing; two, we've been advised by  
24 the Securities and Exchange Commission that  
25 there's been billing to Deer Valley for multiple

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